

**REMARKS**

**I. Introduction**

Claims 1-20 are pending in the application.

The Current Action:

objects to the specification for informalities;

rejects claims 1-3, 5-10, and 13-18 as being unpatentable under 35 U.S.C. § 103(a) over U.S. Patent No. 6,487,569 to Liu et al. (hereinafter *Liu*); and

rejects claims 4, 11, 12, 19, and 20 as unpatentable under 35 U.S.C. § 103(a) over *Liu* in view of U.S. Patent No. 6,654,032 to Zhu et al. (hereinafter *Zhu*).

**II. Amendment to FIGURE 5**

The Examiner has objected to the specification as being inconsistent with FIGURE 5. Applicants have amended FIGURE 5 by submitting a replacement drawing sheet. A mark-up version showing the amendments made has also been submitted. The amendments are supported by, inter alia, page 7, lines 4-16 of the original application. No new matter has been entered. Applicants request the Examiner to withdraw the objection to the specification.

**III. Amendments to the Claims**

Applicants have amended claims 1, 2, 5-7, 11, 13-15, 17, and 19. The amendments are supported by the original application on, inter alia, page 6, lines 11-15, page 8, lines 11-22, and page 11, lines 1-3. No new matter has been entered.

**IV. Rejections under 35 U.S.C. § 103(a)**

The Current Action rejects claims 1-3, 5-10, and 13-18 have been rejected as being unpatentable under 35 U.S.C. § 103(a) over *Liu*.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. *See* M.P.E.P.

§ 2143. Applicants respectfully assert that the Current Action's rejection does not establish a prima facie case.

As noted in the present application, typical "note-taking" software applications, such as the application described in *Liu*, do not capture enough information to enable notes to be understood at a later time. *See* application, page 1, lines 19-24. This is especially true in connection with computer aided design (CAD) applications. Specifically, a CAD design may be updated and notes referring to a prior version of the CAD design may lose meaning, because the prior version may no longer be available for review when the notes are subsequently retrieved.

The subject matter of claims 1, 5, and 13 enables the meaning of notes associated with a CAD application to be maintained. Specifically, claim 1 recites, in part:

a note retrieval module for retrieving and displaying said captured note with a display screen of said three-dimensional model, that existed when said note was generated, using said associated data file.

Claim 5 recites, in part:

associating a data file with said captured note, wherein said data file is used to generate a display of a three-dimensional model of said CAD application that existed when said note was captured.

Claim 13 recites, in part:

associating a data file with said captured note, wherein said data file is used to generate a display of a three-dimensional model of said CAD application that existed at the time the note was captured.

*Liu* does not teach or suggest each and every limitation of claims 1, 5, and 13. Instead, *Liu* discloses associating a note with a particular project. A project is merely a common storage identifier (e.g., a subdirectory identifier) that enables related notes to be associated. *See Liu*, col. 5, lines 17-27. The disclosure of using a subdirectory to store related notes is clearly insufficient to teach or suggest each and every limitation of claims 1, 5, and 13.

Accordingly, a prima facie case of obviousness has not been established for claims 1, 5, and 13. Claims 2, 3, 6-10, and 14-18 depend either directly or indirectly from base claims

1, 5, and 13 and, hence, inherit all limitations of their respective base claim. Accordingly, a prima facie case of obviousness has not been established for claims 2, 3, 6-10, and 14-18.

Applicants respectfully request the Examiner to withdraw the rejection of these claims under 35 U.S.C. § 103(a)

Claims 4, 11, 12, 19, and 20 are rejected as unpatentable under 35 U.S.C. § 103(a) over *Liu* in view of *Zhu*. However, these claims also depend either directly or indirectly from base claims 1, 5, and 13, and, thus, inherit limitations neither taught nor suggested by *Liu*. *Zhu* does not teach or suggest each and every limitation of these base claims. Therefore, the combination of *Liu* and *Zhu* do not teach or suggest all of the limitations of the rejected claims. A prima facie case for the rejection of claims 4, 11, 12, 19, and 20 has not been established. Applicants respectfully request the Examiner to withdraw the rejection.

#### V. Summary

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicants believe that no fee is due with this response. However, if a fee is due with this response, please charge Deposit Account No. 08-2025, under Order 10001114-1 from which the undersigned is authorized to draw.

I hereby certify that this correspondence is being deposited with the U.S. Postal Service as Express Mail, Airbill No. EV255076698US, in an envelope addressed to: MS Non-Fee Amendment, Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Date of Deposit: April 13, 2004

Typed Name: Carrie Wilson

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Respectfully submitted,

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